

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHASE WILLIAMS and WILLIAM ZHANG, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and DANIEL LARIMER,

Defendants.

CRYPTO ASSETS OPPORTUNITY FUND LLC and JOHNNY HONG, Individually and on Behalf of All Others Similarly Situated,,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, DANIEL LARIMER, IAN GRIGG, and BROCK PIERCE,

Defendants.

Civ. No. 1:20-cv-02809-LAK

CLASS ACTION

Civ. No. 1:20-cv-03829-LAK

CLASS ACTION

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING THE FILING OF A RESPONSE TO THE AMENDED COMPLAINT BY DEFENDANT BROCK PIERCE

Plaintiff Crypto Assets Opportunity Fund (“Lead Plaintiff”), individually and on behalf of all others similarly situated, and Defendant Brock Pierce (together, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

**WHEREAS**, on September 15, 2020, plaintiffs caused defendant Brock Pierce to be served with the summons and the then-operative complaint (the “Original Complaint”);

**WHEREAS**, on September 18, 2020, Lead Plaintiff filed an amended class action complaint, Dkt. No. 66 (the “Amended Complaint”), which has been served on Mr. Pierce through the undersigned counsel;

**WHEREAS**, the current deadline for defendants Block.one and Daniel Larimer to move to dismiss, answer, or otherwise respond to the amended complaint is November 2, 2020, Dkt. 28;

**WHEREAS**, the Parties wish to conform the response deadline for Mr. Pierce with the response deadline for Block.one and Mr. Larimer;

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the Parties, subject to the Court’s approval, as follows:

1. The deadline for Mr. Pierce to move to dismiss, answer, or otherwise respond to the amended complaint is November 2, 2020.

Date: New York, NY  
September 23, 2020

Respectfully submitted,

/s/ Daniel L. Berger  
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*Attorneys for Defendants Block.one,  
Daniel Larimer, and Brock Pierce*

SO ORDERED:

Dated: \_\_\_\_\_, 2020

Hon. Lewis A. Kaplan  
United States District Judge